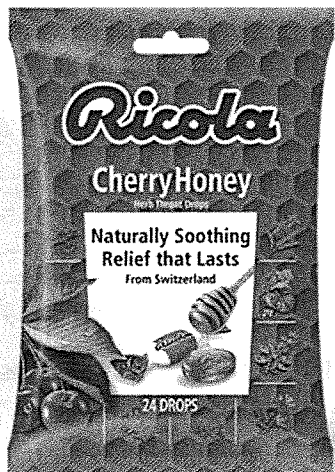


# EXHIBIT A

## TABLE OF CONTENTS

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## Ricola Cherry Honey Herb Throat Drops



### CHERRY HONEY

A delicate, fruity blend of cherry and honey, seasoned with Ricola's herb mixture.



 Recommend

## PRODUCT DETAIL

Click each item for specific nutritional information

### Ingredients

#### Cherry Honey

*Active Ingredient*  
(in each drop)

#### Purposes

Menthol, 2.0 mg

Oral pain reliever

Uses temporarily relieves occasional minor irritation and pain associated with

- sore mouth
- sore throat

### Warnings

Do not use

- In children under 6 years of age unless directed by a doctor.

Stop use and ask a doctor if

- sore throat is severe, persists for more than 2 days, or is accompanied by fever, headache, rash, nausea or vomiting.
- sore mouth symptoms do not improve in 7 days.

Keep out of reach of children.

### Directions

- adults and children 6 years and older: dissolve 2 drops (one at a time) slowly in the mouth. Repeat every 2 hours as needed or as directed by a doctor.
- Children under 6 years: ask a doctor.

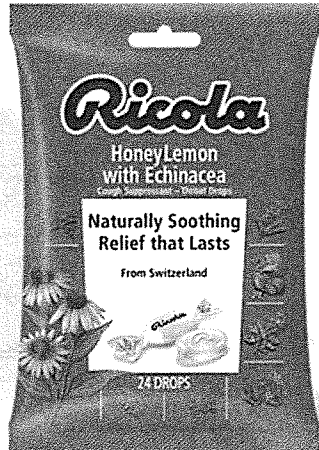
### Other Information

Store in a dry place

### Inactive Ingredients

extract of Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), honey, malic acid, natural cherry concentrate, natural color (extract of fruit and vegetable), natural flavors, starch syrup, sugar


## Ricola Honey Lemon with Echinacea Cough Suppressant Throat Drops



### HONEY LEMON

A combination of honey, herbal lemon balm and echinacea work in harmony to bring soothing relief to sore throats.



 Recommend

## PRODUCT DETAIL

Click each item for specific nutritional information

### Ingredients

Lemon with Echinacea

*Active Ingredient  
(in each drop)*

### Purposes

Cough suppressant  
Oral pain reliever

Menthol, 3.5 mg

Uses temporarily relieves:

- cough due to a cold or inhaled irritants
- occasional minor irritation and pain due to sore throat or sore mouth

### Warnings

Sore throat warnings:

- If sore throat is severe, persists for more than 2 days, is accompanied or followed by fever, headache, rash, swelling, nausea, or vomiting, consult a doctor promptly. These may be serious.
- Do not use in children under 6 years of age unless directed by a doctor.

Ask a doctor before use if you have

- persistent or chronic cough such as occurs with smoking, asthma, or emphysema
- cough accompanied by excessive phlegm (mucus)

Stop use and ask a doctor if

- cough persists for more than 1 week, tends to recur, or is accompanied by fever, rash or persistent headache. These could be signs of a serious condition.
- sore mouth does not improve in 7 days
- irritation, pain, or redness persists or worsens

Keep out of reach of children.

### Directions

- adults and children 6 years and older: dissolve 2 drops (one at a time) slowly in the mouth. Repeat every 2 hours as needed or as directed by a doctor.
- children under 6 years: ask a doctor

### Other Information

Store in a dry place

### Inactive Ingredients

ascorbic acid (vitamin C), citric acid, extract of echinacea and Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), lemon juice concentrate, honey, natural flavors (honey, lemon oil, peppermint oil), starch syrup, sugar


## Ricola Lemon Mint Herb Throat Drops



### LEMON MINT

Lemon Mint is a flavor combination of the Ricola original herb blend and menthol, with a refreshing lemony taste. Ricola Lemon Mint offers relief from the discomfort of a sore throat as well as minor throat irritation.



 Recommend

## PRODUCT DETAIL

Click each item for specific nutritional information

### Ingredients

Lemon Mint

*Active Ingredient  
(in each drop)*

*Purposes*

Menthol, 1.5 mg

Oral pain reliever

Uses temporarily relieves occasional minor irritation and pain associated with

- sore mouth
- sore throat

### Warnings

Do not use

- in children under 6 years of age unless directed by a doctor.

Stop use and ask a doctor if

- sore throat is severe, persists for more than 2 days, or is accompanied by fever, headache, rash, nausea or vomiting.
- sore mouth symptoms do not improve in 7 days

Keep out of reach of Children.

### Directions

- adults and children 6 years and older: dissolve 2 drops (one at a time) slowly in the mouth. Repeat every 2 hours as needed or as directed by a doctor.
- Children under 6 years: ask a doctor.

### Other Information

Store in a dry place

### Inactive Ingredients

citric acid, extract of lemon balm and Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), natural color (beta-carotene), natural flavors (lemon oil, peppermint oil), starch syrup, sugar




## Ricola Sugar-free Lemon Mint herb Throat Drops



### LEMON MINT

Lemon Mint is a flavor combination of the Ricola original herb blend and menthol, with a refreshing lemony taste. Ricola Lemon Mint offers relief from the discomfort of a sore throat as well as minor throat irritation.



 Recommend

QDV BSNVZ+GIN,2 CNN

## PRODUCT DETAIL

Click each item for specific nutritional information

Ingredients

Sugar Free Lemon Mint

*Active Ingredient  
(in each drop)*

*Purposes*

Menthol, 1.1 mg

Oral pain reliever

Uses temporarily relieves occasional minor irritation and pain associated with:

- sore mouth
- sore throat

Warnings:

Do not use

- in children under 6 years of age unless directed by a doctor.

Stop use and ask a doctor if

- sore throat is severe, persists for more than 2 days, or is accompanied by fever, headache, rash, nausea or vomiting.
- sore mouth symptoms do not improve in 7 days.

Keep out of reach of Children.

Directions

- adults and children 6 years and older: dissolve 2 drops (one at a time) slowly in the mouth. Repeat every 2 hours as needed or as directed by a doctor.
- Children under 6 years: ask a doctor.

Other Information

- Phenylketonurics, contains phenylalanine 1mg per drop.
- Excessive use may cause laxative effect
- Store in a dry place
- Product may be useful for diabetics on the advice of a doctor

Exchange Information

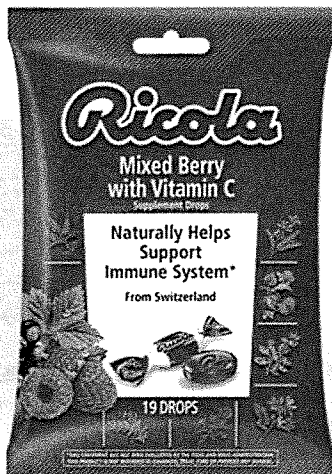
- 2 Drops = FREE Exchange
- 7 Drops = 1 Fruit

*Dietary exchanges based on Exchange Lists for Diabetes.  
© 2008 American Diabetes Association, American Dietetic Association.*

**Inactive Ingredients**

ascorbic acid (vitamin C), aspartame, citric acid, extract of lemon balm and Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), isomalt, natural color (beta-carotene), natural flavors (lemon oil, peppermint oil)

## Ricola Mixed Berry with Vitamin C Supplement Drops



### MIXED BERRY

Raspberries, blueberries and currants: For a mixed berry flavor that is truly outstanding and a herbal freshness that is uniquely Ricola.



FB Recommend

### PRODUCT DETAIL

Click each item for specific nutritional information

#### Ingredients

Mixed Berry  
with Vitamin C

Supplemental Drops  
Helps Support Immune System\*

#### Ingredients

Sugar, starch syrup, sodium ascorbate (vitamin C), citric acid, extract of Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), raspberry juice concentrate, black currant juice concentrate, bilberry juice concentrate, natural flavors, natural color (extract of fruit and vegetable).

#### Suggested use

As a dietary supplement, take 2 to 8 drops per day.

#### Warnings

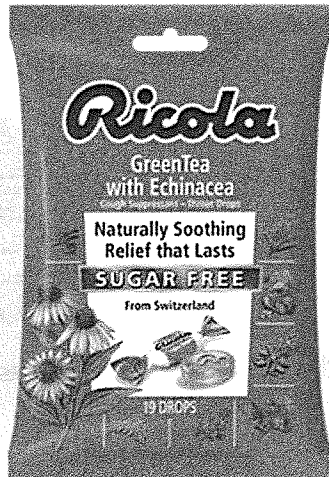
Keep out of reach of children.

#### Other information

Store in a dry place.

*\* This statement has not been evaluated by the food and drug administration. This product is not intended to diagnose, treat, cure or prevent any disease.*


## Ricola Sugar-free Green Tea with Echinacea Cough Suppressant Throat Drops



### SUGAR FREE GREEN TEA

Strong relief of coughs and sore throats with the added benefits of green tea and echinacea extracts.



 Recommend

## PRODUCT DETAIL

Click each item for specific nutritional information

### Ingredients

Sugar Free Green Tea with Echinacea

*Active Ingredient  
(in each drop)*

*Purposes*

Menthol, 4.1 mg

Cough suppressant  
Oral pain reliever

Uses temporarily relieves:

- cough due to cold or inhaled irritants
- occasional minor irritation and pain due to sore throat or sore mouth

### Warnings

Sore throat warnings:

- if sore throat is severe, persists for more than 2 days, is accompanied or followed by fever, headache, rash, swelling, nausea, or vomiting, consult a doctor promptly. These may be serious.
- Do not use in children under 6 years of age unless directed by a doctor.

Ask a doctor before use if you have

- persistent or chronic cough such as occurs with smoking, asthma, or emphysema
- cough accompanied by excessive phlegm (mucus)

Stop use and ask a doctor if

- cough persists for more than 1 week, tends to recur, or is accompanied by fever, rash or persistent headache. These could be signs of a serious condition.
- sore mouth does not improve in 7 days
- irritation, pain, or redness persists or worsens

Keep out of reach of children.

### Directions

- adults and children 6 years and older: dissolve 2 drops (one at a time) slowly in the mouth. Repeat every 2 hours as needed or as directed by a doctor.
- Children under 6 years: ask a doctor.

### Other Information

- Phenylketonurics, contains phenylalaline 1mg per drop.
- Excessive use may cause laxative effect
- Store in a dry place
- Product may be useful for diabetics on the advice of a doctor

### Exchange Information

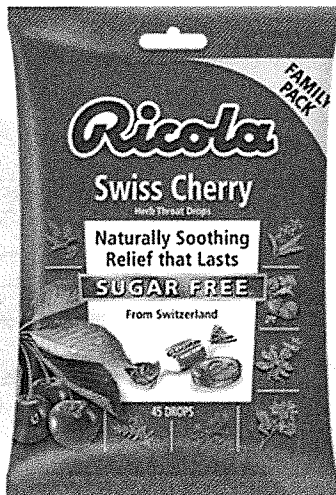
- 2 Drops = FREE Exchange
- 7 Drops = 1 Fruit

*Dietary exchanges based on Exchange Lists for Diabetes.  
© 2008 American Diabetes Association, American Dietetic Association.*

### Inactive Ingredients

aspartame, citric acid, extracts of echinacea, green tea, peppermint and Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), isomalt, natural color (chlorophyll), natural flavors (peppermint oil, spearmint oil), sorbitol


## Ricola Sugar-free Swiss Cherry Herb Throat Drops



### SWISS CHERRY

Natural cherry combined with Ricola's delicious mixture of Swiss alpine herbs. Refreshing and naturally effective.



 Recommend

## PRODUCT DETAIL

Click each item for specific nutritional information

### Ingredients

Sugar Free Cherry  
Active Ingredient  
(in each drop)

### Purposes

Menthol, 2.2 mg

Oral pain reliever

Uses temporarily relieves occasional minor irritation and pain associated with

- sore mouth
- sore throat

### Warnings

Do not use

- in children under 6 years of age unless directed by a doctor.

Stop use and ask a doctor if

- sore throat is severe, persists for more than 2 days, or is accompanied by fever, headache, rash, nausea or vomiting.
- sore mouth symptoms do not improve in 7 days.

Keep out of reach of children.

### Directions

- adults and children 6 years and older: dissolve 2 drops (one at a time) slowly in the mouth. Repeat every 2 hours as needed or as directed by a doctor.
- children under 6 years: ask a doctor

### Other Information

- Phenylketonurics, contains phenylalanine 1 mg per drop.
- excessive use may have a laxative effect
- store in a dry place
- product may be useful for diabetics on the advice of a doctor

### Exchange information

- 2 Drops = FREE Exchange
- 7 Drops = 1 Fruit

*Dietary exchanges based on Exchange Lists for Diabetes.  
©2008 American Diabetes Association, American Dietetic Association*

### Inactive Ingredients

aspartame, citric acid, extract of Ricola's herb mixture (elder, horehound, hyssop, lemon balm, linden flowers, mallow, peppermint, sage, thyme, wild thyme), isomalt, natural cherry concentrate, natural color (extract of fruit and vegetable), natural flavors

# EXHIBIT B



Non 8  
Syn 5

allowed

## NOSB NATIONAL LIST FILE CHECKLIST

### PROCESSING

MATERIAL NAME: Citric Acid

CATEGORY: Synthetic Allowed

Complete?: 3/16

✓

NOSB Database Form

✓

References

✓

MSDS (or equivalent)

✓

FASP (FDA)

✓

Date file mailed out: 1/8/95

✓

TAP Reviews from: Steve Taylor

Steven Harper

Bob Durst

Supplemental Information:

microbial form only ----

because of substrate might be  
as product

MISSING INFORMATION: \_\_\_\_\_

## NOSB/NATIONAL LIST COMMENT FORM/BALLOT

Use this page to write down comments and questions regarding the data presented in the file of this National List material. Also record your planned opinion/vote to save time at the meeting on the National List.

Name of Material Citric Acid

Type of Use:      Crops;      Livestock; ☒ Processing

TAP Review by:

1. Steve Taylor
2. Steven Harper
3. Bob Durst

Comments/Questions:

---

My Opinion/Vote is:

Signature \_\_\_\_\_ Date \_\_\_\_\_

1.

## USDA/TAP REVIEWER COMMENT FORM

Use this page or an equivalent to write down comments and summarize your evaluation regarding the data presented in the file of this potential National List material. Attach additional sheets if you wish.

This file is due back to us within 30 days of: Jan 7

Name of Material: Citric Acid

Reviewer Name: Steve Taylor

Is this substance Natural or Synthetic? Explain (if appropriate)

Natural

Please comment on the accuracy of the information in the file:

This material should be added to the National List as:

       Synthetic Allowed        Prohibited Natural

or,        This material does not belong on the National List because:

Are there any restrictions or limitations that should be placed on this material by use or application on the National List?

Made by fermentation. Fermentation is natural but process does ~~not~~ involve use of other substances: Substrates: corn syrup, sucrose  
Any additional comments or references? ammonium bicarbonate

Need to find out more about process and processing aids to make determination.

Signature

Steve Taylor

Date

3-5-95

2.

## USDA/TAP REVIEWER COMMENT FORM

Use this page or an equivalent to write down comments and summarize your evaluation regarding the data presented in the file of this potential National List material. Attach additional sheets if you wish.

This file is due back to us within 30 days of: Jan 7

Name of Material: Citric Acid

Reviewer Name: Steven Harper

Is this substance Natural or Synthetic? Explain (if appropriate)

Synthetic

Please comment on the accuracy of the information in the file:

Good

This material should be added to the National List as:

  x   Synthetic Allowed        Prohibited Natural

or,        This material does not belong on the National List because:

Are there any restrictions or limitations that should be placed on this material by use or application on the National List?

No.

Any additional comments or references?

Signature Steven Harper Date 3/10/15

3.

## USDA/TAP Reviewer Comment Form

Material: Citric acid

Reviewer: Bob Durst

---

Is this substance Natural or Synthetic? Explain (if appropriate)

It is a natural occurring substance that commercially goes through numerous chemical processes to get to it's final usable form. This processing would suggest that it be classified as synthetic.

Please comment on the accuracy of the information in the file:

The file is accurate.

This material should be added to the National List as:

- ☒ Synthetic Allowed,  
☐ Prohibited Natural, or  
☐ This material does not belong on the National List because:

Are there any restriction or limitations that should be placed on this material by use or application on the National List?

Must be listed on the ingredient label if it used used.


Unless it is actually derived from a natural source the labeling must not indicate that it is a natural compound.

Any additional comments or references?

As with all synthetic inorganic salts, source must be food grade. In addition each lot should be analyzed for toxic element concentrations (mercury, lead, cadmium, arsenic, thallium and antimony) and a near zero tolerance adopted.

Since citrus juices are a high natural source of citric acid, it might be advisable to find a manufacturer that is willing to isolate citric acid from organically grown fruit in an organically acceptable manner, and get a natural citric acid.

Signature



Date

3/4/15

## NOSB Materials Database

4.

Identification

<b>Common Name</b>	<b>Citric Acid</b>	<b>Chemical Name</b>	B-hydroxy-tricarboxylic acid C <sub>6</sub> H <sub>8</sub> O <sub>7</sub>
<b>Other Names</b>	Citric Acid, Anhydrous USP/FCC		
<b>Code #: CAS</b>	77-92-9	<b>Code #: Other</b>	21 CFR 182-1033
<b>N. L. Category</b>	Synthetic Allowed	<b>MSDS</b>	<input checked="" type="radio"/> yes <input type="radio"/> no

Chemistry

<b>Family</b>	Aliphatic Acid
<b>Composition</b>	C <sub>6</sub> H <sub>8</sub> O <sub>7</sub>
<b>Properties</b>	Colorless, translucent crystals, (or) white granular to fine crystalline powder, odorless, strong acid taste.
<b>How Made</b>	Traditionally by extraction from citrus juice, no longer commercially available. It is now extracted by fermentation of a carbohydrate substrate (often molasses) by citric acid bacteria, <i>Aspergillus niger</i> (a mold) or <i>Candida guilliermondii</i> (a yeast). Citric acid is recovered from the fermentation broth by a lime and sulfuric acid process in which the citric acid is first precipitated as a calcium salt and then reacidulated with sulfuric acid.

Use/Action

<b>Type of Use</b>	Processing
<b>Specific Use(s)</b>	Production of fruit products, juices, oils, fats etc. for pH control, flavor enhancer, flavoring agent or adjuvant, leavening agent, sequestrant, antioxidant, solvent, antimicrobial agent, surface-active agent
<b>Action</b>	Optimizes stability of frozen foods by enhancing the action of antioxidants and inactivating enzymes. Brings out flavor in carbonated beverages. Acts as a synergist for antioxidants employed in inhibiting rancidity in foods containing fats and oils.
<b>Combinations</b>	pure substance

Status

<b>OFPA</b>	
<b>N. L. Restriction</b>	Currently considered synthetic by NOSB.
<b>EPA, FDA, etc</b>	FDA -GRAS
<b>Directions</b>	
<b>Safety Guidelines</b>	Eye irritant, dust may cause mild respiratory irritation.
<b>State Differences</b>	
<b>Historical status</b>	Always been allowed in organic processing and considered natural.
<b>International status</b>	Allowed by IFOAM, EU and Codex.

## NOSB Materials Database

5.

### OFPA Criteria

2119(m)1: chemical interactions      Not Applicable

2119(m)2: toxicity & persistence      Not Applicable

2119(m)3: manufacture & disposal consequences

Microbial fermentation –Clarification --Precipitation –Dissolution –Crystallization –Drying –Sifting –packaging.  
The NOSB judged that citric acid produced by natural fermentation of carbohydrate substrates and purified by the lime-sulfuric method is synthetic because the citric acid comes into contact with lime and sulfuric acid and because of the chemical change from citric acid to calcium citrate and then back to citric acid during purification.  
Biomass residuals are usually recycled as animal feeds and for agriculture.

2119(m)4: effect on human health

Material has been affirmed as GRAS by FDA for use in foods. The amount of citrate added to foods by food processors is about 500 mg per person per day. This amount occurs naturally in 2 ounces of orange juice and does not constitute a significant addition to the total body load.

Long term oral over exposure may cause damage to tooth enamel. Considered an irritant to eyes and respiratory system during manufacture and handling. Recommended use of eye and respiratory protection during handling. Oral LD50 (rat) 11,700 mg/kg; dermal (acute) tested on skin of rabbit 500mg/24 hr moderate; eye 750 mg/24hr severe. FDA tests show no effect on reproduction, teratogenicity or oncogenicity in rats.

2119(m)5: agroecosystem biology      Not Applicable

2119(m)6: alternatives to substance

Lactic acid ( has some taste problems and not used in infant foods).

Vinegar (strange taste in some foods).

Citrus juices.

2119(m)7: Is it compatible?

Compatible

### References

1. FDA. 1977. Evaluation of the health aspects of citric acid, sodium citrate, potassium citrate, calcium citrate, ammonium citrate, triethyl citrate, isopropyl citrate, and stearyl citrate as food ingredients. SCOGS-84. Life Science Research Office, 9650 Rockville Pike, Bethesda, Maryland 20014.

2. Ag Partners of Davis, *Materials Report for Citric Acid*, 1995. Organic Trade Association, Greenfield, MA

6.

-----  
MSDS for CITRIC ACID, MONOHYDRATE  
-----

Page 1

-----  
1 - PRODUCT IDENTIFICATION  
-----

PRODUCT NAME: CITRIC ACID, MONOHYDRATE  
 FORMULA:  $\text{HOC}(\text{COOH})(\text{CH}_2\text{COOH})_2 \text{H}_2\text{O}$  FORMULA WT: 210.14  
 CAS NO.: 5949-29-1  
 COMMON SYNONYMS: 2-HYDROXY-1,2,3,PROPANE-TRICARBOXYLIC ACID, MONOHYDRATE  
 PRODUCT CODES: 0118,0120,0119,0110  
 EFFECTIVE: 12/01/86 REVISION #02

## PRECAUTIONARY LABELLING

BAKER SAF-T-DATA(TM) SYSTEM

HEALTH - 0 NONE

FLAMMABILITY - 1 SLIGHT

REACTIVITY - 0 NONE

CONTACT - 1 SLIGHT

HAZARD RATINGS ARE 0 TO 4 (0 = NO HAZARD; 4 = EXTREME HAZARD).

LABORATORY PROTECTIVE EQUIPMENT: SAFETY GLASSES; LAB COAT

## PRECAUTIONARY LABEL STATEMENTS

CAUTION

MAY CAUSE IRRITATION

DURING USE AVOID CONTACT WITH EYES, SKIN, CLOTHING. WASH THOROUGHLY AFTER HANDLING. WHEN NOT IN USE KEEP IN TIGHTLY CLOSED CONTAINER.

SAF-T-DATA(TM) STORAGE COLOR CODE: ORANGE (GENERAL STORAGE)

-----  
2 - HAZARDOUS COMPONENTS  
-----

COMPONENT	%	CAS NO.
CITRIC ACID, MONOHYDRATE		05949-29-1

-----  
3 - PHYSICAL DATA  
-----

BOILING POINT: N/A VAPOR PRESSURE(MM HG): N/A  
 MELTING POINT: N/A VAPOR DENSITY(AIR=1): N/A  
 SPECIFIC GRAVITY: 1.54 EVAPORATION RATE: N/A  
 (H<sub>2</sub>O=1) (BUTYL ACETATE=1)  
 SOLUBILITY(H<sub>2</sub>O): APPRECIABLE (MORE THAN 10 %) % VOLATILES BY VOLUME: 0  
 APPEARANCE & ODOR: WHITE, ODORLESS POWDER.

-----  
4 - FIRE AND EXPLOSION HAZARD DATA  
-----

FLASH POINT (CLOSED CUP) N/A  
 FLAMMABLE LIMITS: UPPER - N/A % LOWER - N/A %  
 FIRE EXTINGUISHING MEDIA  
 USE WATER SPRAY, CARBON DIOXIDE, DRY CHEMICAL OR ORDINARY FOAM.

## SPECIAL FIRE-FIGHTING PROCEDURES

FIREFIGHTERS SHOULD WEAR PROPER PROTECTIVE EQUIPMENT AND SELF-CONTAINED  
 BREATHING APPARATUS WITH FULL FACEPIECE OPERATED IN POSITIVE PRESSURE MODE.



7.

TOXIC GASES PRODUCED: CARBON MONOXIDE, CARBON DIOXIDE

#### 5 - HEALTH HAZARD DATA

TOXICITY TEST RESULTS AND SAFETY AND HEALTH EFFECTS ARE LISTED FOR THE ANHYDROUS PRODUCT.

TOXICITY: LD50 (ORAL-RAT)(G/KG) - 11.7

LD50 (IPR-RAT)(MG/KG) - 883

LD50 (SCU-RAT)(MG/KG) - 5500

LD50 (ORAL-MOUSE)(MG/KG) - 5040

CARCINOGENICITY: NTP: NO IARC: NO Z LIST: NO OSHA REG: NO

EFFECTS OF OVEREXPOSURE

DUST MAY IRRITATE NOSE AND THROAT.

DUST MAY CAUSE HEADACHE, COUGHING, DIZZINESS OR DIFFICULT BREATHING.

DUST MAY IRRITATE OR BURN MUCOUS MEMBRANES.

CONTACT WITH SKIN OR EYES MAY CAUSE IRRITATION.

TARGET ORGANS: EYES, SKIN

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: NONE IDENTIFIED

ROUTES OF ENTRY: INHALATION, EYE CONTACT, SKIN CONTACT

EMERGENCY AND FIRST AID PROCEDURES

INGESTION: IF SWALLOWED AND THE PERSON IS CONSCIOUS, IMMEDIATELY GIVE LARGE AMOUNTS OF WATER. GET MEDICAL ATTENTION.

INHALATION: IF A PERSON BREATHES IN LARGE AMOUNTS, MOVE THE EXPOSED PERSON TO FRESH AIR. GET MEDICAL ATTENTION.

EYE CONTACT: IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION.

SKIN CONTACT: IMMEDIATELY WASH WITH PLENTY OF SOAP AND WATER FOR AT LEAST 15 MINUTES.

#### 6 - REACTIVITY DATA

STABILITY: STABLE HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

INCOMPATIBLES: STRONG BASES

DECOMPOSITION PRODUCTS: CARBON MONOXIDE, CARBON DIOXIDE

#### 7 - SPILL AND DISPOSAL PROCEDURES

STEPS TO BE TAKEN IN THE EVENT OF A SPILL OR DISCHARGE

WEAR SUITABLE PROTECTIVE CLOTHING. CAREFULLY SWEEP UP AND REMOVE.

DISPOSAL PROCEDURE

DISPOSE IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE, AND LOCAL ENVIRONMENTAL REGULATIONS.

#### 8 - PROTECTIVE EQUIPMENT

VENTILATION: USE ADEQUATE GENERAL OR LOCAL EXHAUST VENTILATION TO KEEP FUME OR DUST LEVELS AS LOW AS POSSIBLE.

RESPIRATORY PROTECTION: NONE REQUIRED WHERE ADEQUATE VENTILATION CONDITIONS EXIST. IF AIRBORNE CONCENTRATION IS HIGH, USE AN APPROPRIATE RESPIRATOR OR DUST MASK.

EYE/SKIN PROTECTION: SAFETY GLASSES WITH SIDESHIELDS, NITRILE GLOVES RECOMMENDED.

8.

-----  
9 - STORAGE AND HANDLING PRECAUTIONS  
-----

SAF-T-DATA(TM) STORAGE COLOR CODE: ORANGE (GENERAL STORAGE)  
SPECIAL PRECAUTIONS

KEEP CONTAINER TIGHTLY CLOSED. SUITABLE FOR ANY GENERAL CHEMICAL STORAGE  
AREA.

-----  
10 - TRANSPORTATION DATA AND ADDITIONAL INFORMATION  
-----

DOMESTIC (D.O.T.)

PROPER SHIPPING NAME CHEMICALS, N.O.S. (NON-REGULATED)

INTERNATIONAL (I.M.O.)

PROPER SHIPPING NAME CHEMICALS, N.O.S. (NON-REGULATED)

9.

05 MAY 94  
 DOCNUM=1937

PAGE 1

U.S. FOOD AND DRUG ADMINISTRATION  
 FOOD ADDITIVE SAFETY PROFILE

-----  
 CITRIC ACID

CAS#: 000077929 HUMAN CONSUMPTION: 90.5367 MG/KG BW/DAY/PERSON  
 FASP#: 1937 MARKET DISAPPEARANCE: 106833333.333LBS/YR  
 TYPE: ASP MARKET SURVEY: 87  
 NAS#: 2306 JECFA: NL-C  
 FEMA#: 2306 JECFA ADI: MG/KG BW/DAY/PERSON  
 GRAS#: 3 JECFA ESTABLISHED: 1979  
 POTENTIAL BEVERAGE USE LAST UPDATE: 931115  
 FW: 192.12 DENSITY: LOGP:

STRUCTURE CATEGORIES: A6

COMPONENTS:

SYNONYMS: CITRIC ACID, ANHYDROUS  
 2-HYDROXY-1,2,3-PROPANETRICARBOXYLIC ACID  
 HYDROXYTRICARBOXYLIC ACID, BETA-  
 1,2,3-PROPANETRICARBOXYLIC ACID, 2-HYDROXY-  
 ACIDE CITRIQUE

CHEMICAL FUNCTION: F

TECHNICAL EFFECT: PH CONTROL AGENT  
 FLAVOR ENHANCER  
 FLAVORING AGENT OR ADJUVANT  
 LEAVENING AGENT  
 SEQUESTANT  
 ANTIOXIDANT  
 SOLVENT OR VEHICLE  
 SURFACE-ACTIVE AGENT  
 ANTIMICROBIAL AGENT  
 ENZYME

CFR REG NUMBERS:	173.165	172.755	182.6033
	182.1033	PART 133	PART 146
	161.190	PART 169	PART 150
	155.130	145.145	131.111
	131.112	131.136	131.144
	131.138	131.146	146.187
	150.161	150.141	166.40
	169.115	169.140	169.150
	173.160	173.280	145.131
	166.110	184.1033	

MINIMUM TESTING LEVEL: 3

COMMENTS: STUDY 1-12 FROM SCOGS-84

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 BOX 4A: LOWEST EFFECT LEVEL OBSERVED IN ALL AVAILABLE RAT OR MOUSE STUDIES

STUDY: 4 COMPLETENESS: RANKING FACTOR: 1.938E-2  
 SPECIES: RAT LEL: 4670 MG/KG BW/DAY  
 EFFECTS: CHOLESTEROL DECREASE  
 GLUTAMIC-OXALOACETIC TRANSAMINASE (SGOT/AST) INCREASE  
 ORGAN WEIGHT DECREASE  
 CELLULAR ATROPHY  
 SITES: THYMUS  
 SPLEEN  
 COMMENTS: MALES ONLY  
 SLIGHT ATROPHY OF THYMUS AND SPLENIC FOLLICLES  
 DATA FROM SCOGS-84  
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## BOX 4C: LOWEST EFFECT LEVEL OBSERVED IN ALL AVAILABLE STUDIES

STUDY: 4 COMPLETENESS: RANKING FACTOR: 1.938E-2  
 SPECIES: RAT LEL: 4670 MG/KG BW/DAY  
 EFFECTS: CHOLESTEROL DECREASE  
 GLUTAMIC-OXALOACETIC TRANSAMINASE (SGOT/AST) INCREASE  
 ORGAN WEIGHT DECREASE  
 CELLULAR ATROPHY  
 SITES: THYMUS  
 SPLEEN  
 COMMENTS: MALES ONLY  
 SLIGHT ATROPHY OF THYMUS AND SPLENIC FOLLICLES  
 DATA FROM SCOGS-84

## BOX 7: ACUTE TOXICITY INFORMATION

STUDY: 2 SOURCE: J TAKEDA RES LAB 30:25-31  
 SPECIES: RAT YEAR: 1971  
 LD50: 12000 MG/KG BW  
 COMMENTS:  
 STUDY: 1 SOURCE: J TAKEDA RES LAB 30:25-31  
 SPECIES: MOUSE YEAR: 1971  
 LD50: 5000 MG/KG BW  
 COMMENTS:

## BOX 9: ORAL TOXICITY STUDIES (OTHER THAN ACUTE)

STUDY: 3 COMPLETENESS: SOURCE: REV PORT FARM 20:41-46  
 TYPE: SHORT TERM YEAR: 1970  
 SPECIES: RAT LEL: 200 MG/KG BW/DAY  
 DURATION: 9 DAYS HNEL:  
 EFFECTS: BODY WEIGHT DECREASE  
 SITES:  
 COMMENTS: INITIAL DECREASE IN WEIGHT DID NOT PERSIST  
 NOT USED FOR PRIORITY RANKING  
 STUDY: 4 COMPLETENESS: SOURCE: J TAKEDA RES LAB 30:25-31  
 TYPE: SHORT TERM YEAR: 1971  
 SPECIES: RAT LEL: 4670 MG/KG BW/DAY  
 DURATION: 42 DAYS HNEL: 2260 MG/KG BW/DAY  
 EFFECTS: CHOLESTEROL DECREASE  
 GLUTAMIC-OXALOACETIC TRANSAMINASE (SGOT/AST) INCREASE  
 ORGAN WEIGHT DECREASE  
 CELLULAR ATROPHY  
 SITES: THYMUS SPLEEN  
 COMMENTS: SLIGHT ATROPHY OF THYMUS AND SPLENIC FOLLICLES  
 STUDY: 5 COMPLETENESS: SOURCE: J AM PHARM ASSOC SCI ED  
 34:86-89  
 TYPE: SUBCHRONIC RODENT YEAR: 1945  
 SPECIES: RAT LEL: > MG/KG BW/DAY  
 DURATION: 90 DAYS HNEL: 600 MG/KG BW/DAY  
 EFFECTS: NO EFFECTS  
 SITES:  
 COMMENTS: BODY WEIGHT, BLOOD, HISTOPATH AND REPRODUCTION OBSERVED  
 STUDY: 6 COMPLETENESS: SOURCE: J AM PHARM ASSOC SCI ED  
 34:86-89  
 TYPE: SUBCHRONIC MAMMAL (NON-RODENT) YEAR: 1945  
 SPECIES: DOG LEL: > MG/KG BW/DAY  
 DURATION: 112 DAYS HNEL: 1380 MG/KG BW/DAY  
 EFFECTS: NO EFFECTS  
 SITES:  
 COMMENTS: NO BEHAVIORAL, BIOCHEMICAL OR HISTOPATHOLOGICAL ABNORMALITIES  
 STUDY: 10 COMPLETENESS: SOURCE: GRP 7T0195 3  
 TYPE: TERATOGENICITY YEAR: 1973  
 SPECIES: RAT LEL: > MG/KG BW/DAY

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DURATION: 10 DAYS  
EFFECTS: NO EFFECTS  
SITES:  
COMMENTS: ADMINISTERED DAY 6-15 OF GESTATION

HNEL: 295 MG/KG BW/DAY

STUDY: 9  
TYPE: TERATOGENICITY  
SPECIES: MOUSE  
DURATION: 10 DAYS  
EFFECTS: NO EFFECTS  
SITES:  
COMMENTS: ADMINISTERED DAY 6-15 OF GESTATION

COMPLETENESS: SOURCE: GRP 7T0195 3

YEAR: 1973

LEL: > MG/KG BW/DAY  
HNEL: 241 MG/KG BW/DAY

STUDY: 11  
TYPE: TERATOGENICITY  
SPECIES: HAMSTER  
DURATION: 5 DAYS  
EFFECTS: NO EFFECTS  
SITES:  
COMMENTS: ADMINISTERED DAY 6-10 OF GESTATION

COMPLETENESS: SOURCE: GRP 7T0195 3

YEAR: 1973

LEL: > MG/KG BW/DAY  
HNEL: 272 MG/KG BW/DAY

STUDY: 12  
TYPE: TERATOGENICITY  
SPECIES: RABBIT  
DURATION: 13 DAYS  
EFFECTS: NO EFFECTS  
SITES:  
COMMENTS: ADMINISTERED DAY 6-18 OF GESTATION

COMPLETENESS: SOURCE: GRP 7T0195 3

YEAR: 1973

LEL: > MG/KG BW/DAY  
HNEL: 425 MG/KG BW/DAY

STUDY: 8  
TYPE: RAT ONCOGENICITY  
SPECIES: RAT  
DURATION: 728 DAYS  
EFFECTS: NO EFFECTS  
SITES:  
COMMENTS: MALES ONLY

COMPLETENESS: SOURCE: J AGRIC FOOD CHEM 5:759-760

YEAR: 1957

LEL: > MG/KG BW/DAY  
HNEL: 2000 MG/KG BW/DAY

STUDY: 7  
TYPE: REPRODUCTION (3-GENERATION)  
SPECIES: RAT  
DURATION:  
EFFECTS: NO EFFECTS  
SITES:  
COMMENTS:

COMPLETENESS: SOURCE: VOEDING 17:137-148

YEAR: 1956

LEL: > MG/KG BW/DAY  
HNEL: 800 MG/KG BW/DAY

## BOX 3: GENETIC TOXICITY STUDIES

STUDY: 15  
TYPE:  
SPECIES:  
DURATION:  
EFFECTS:  
CELLS:  
COMMENTS:

COMPLETENESS:

SOURCE:

YEAR:

LEL:

MG/KG BW/DAY

HNEL:

# EXHIBIT C











# EXHIBIT D

**LEE LITIGATION GROUP, PLLC**

**30 EAST 39TH STREET, SECOND FLOOR**

**NEW YORK, NEW YORK 10016**

**TEL: 212-465-1180**

**FAX: 212-465-1181**

**INFO@LEELITIGATION.COM**

WRITER'S DIRECT: 212-465-1188  
cklee@leelitigation.com

September 11, 2015

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Legal Department  
Ricola USA Inc.  
6 Campus Dr. 2nd Floor South  
Parsippany, NJ 07054

*Re: Demand Letter re:* Ricola Cherry Honey herb throat drops  
Ricola Honey Lemon with Echinacea cough suppressant throat drops  
Ricola Lemon Mint herb throat drops  
Ricola Sugar-free Lemon Mint herb throat drops  
Ricola Mixed Berry with Vitamin C supplement drops  
Ricola Sugar-free Green Tea with Echinacea cough suppressant throat drops  
Ricola Sugar-free Swiss Cherry herb throat drops  
(together, the "Products").

To Whom It May Concern:

This demand letter serves as a notice and demand for corrective action on behalf of my client, Valerie Liu and all other persons similarly situated, arising from violations of numerous provisions of California law including the Consumers Legal Remedies Act, Civil Code § 1770, including but not limited to subsections (a)(5) and (9) and violations of consumer protection laws of each of the fifty states and the District of Columbia. This demand letter serves as notice pursuant to state laws concerning your deceptive and misleading Product labeling and packaging.

You have participated in the manufacture, marketing and sale of the Ricola Throat Drop Products. The Products are falsely and misleadingly represented as "Naturally Soothing" on their labels even though they contain the non-natural, highly chemically and industrially processed ingredients Ascorbic Acid (Vitamin C), Citric Acid and Malic Acid. Such representations are false and misleading and violate consumer protection laws of each of the fifty states and the District of Columbia as well as Section 403 of the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 343. As a result, the Products are misbranded.

Ms. Valerie Liu, a resident of California, purchased the Ricola Throat Drop Products, including the Honey Lemon with Echinacea and Sugar-free Swiss Cherry flavors, in reliance on the natural claims on the packaging and is acting on behalf of a

class defined as all persons in each of the fifty states and the District of Columbia who purchased the Products (hereafter, the "Class"). While Ascorbic Acid (Vitamin C), Citric Acid and Malic Acid are and can be naturally occurring ingredients, they are synthetic and/or highly chemically altered in industrially processed food products such as Ricola Throat Drop Products. Such ingredients were not expected by Ms. Liu, nor would they be expected by other reasonable customers, to be in products with a "Naturally Soothing" claim on their labels.

To cure the defects described above, we demand that you (i) cease and desist from continuing to label and package the Products as "Naturally Soothing"; (ii) disclose on the labels of the Products the fact that Ascorbic Acid (Vitamin C), Citric Acid and Malic Acid are not natural; (iii) issue an immediate recall on any Products with such misrepresentations or failure to disclose required information; and (iv) make full restitution to all purchasers throughout the United States of all purchase money obtained from sales thereof.

We further demand that you preserve all documents and other evidence which refer or relate to any of the above-described practices including, but not limited to the following:

- (i) All documents concerning the manufacture, labeling and packaging process for the Products;
- (ii) All communications with the U.S. Food and Drug Administration concerning the product development, labeling, packaging, marketing and sales of the Products;
- (iii) All documents concerning the advertisement, marketing, or sale of the Products; and
- (iv) All communications with customers concerning complaints or comments concerning the Products.

We are willing to negotiate to attempt to resolve the demands asserted in this letter. If you wish to enter into such discussions, please contact me immediately. If I do not hear from you promptly, I will conclude that you are not interested in resolving this dispute short of litigation. If you contend that any statement in this letter is inaccurate in any respect, please provide us with your contentions and supporting documents promptly.

Very truly yours,



C.K. Lee, Esq.